UNITED STATES BANKRUPTCY COURT NORTHERN DISTRICT OF OHIO EASTERN DIVISON

IN RE:) CASE NO. 20-51998	
)	
GRANT T. WILCOX) CHAPTER 13	
)	
Debtor) HON. ALAN M. KO	SCHIK

MOTION TO WITHDRAW AS COUNSEL OF RECORD

Now comes Attorney Peter G. Tsarnas, and hereby moves this Court for an Order allowing Attorney Peter G. Tsarnas to withdraw as counsel in the within action. For cause, counsel states that the Debtor failed to appear for the First Meeting of Creditors scheduled for December 10, 2020 and December 17, 2020. Furthermore, the Debtor has left threatening voice mail messages for counsel and has also directly contacted and threatened opposing counsel, Attorney Anthony J. DeGirolamo. The undersigned can no longer represent the Debtor under these circumstances.

WHEREFORE, Attorney Peter G. Tsarnas respectfully requests that the Court grant this Motion and enter an Order allowing the undersigned to withdraw as counsel in this case and for such other and further relief as this Court deems proper.

Dated: December 17, 2020 Respectfully submitted,

/s/ Peter G. Tsarnas
PETER G. TSARNAS, #0076934
Gertz & Rosen, Ltd.
11 South Forge Street
Akron, OH 44304
(330) 255-0735 - Telephone
(330) 315-7542 - Fax
ptsarnas@gertzrosen.com

Counsel for Debtor

CERTIFICATE OF SERVICE

I certify that on December 17, 2020, a true and correct copy of the Motion to Withdraw as Counsel of Record was served:

Via the Court's Electronic Case Filing System on these entities and individuals who are listed on the Court's Electronic Mail Notice List:

Anthony J. DeGirolamo, Esq. (tony@ajdlaw7-11.com)

Attorney for Sara N. Butts

Keith L. Rucinski, Esq. (<u>krucinski@ch13akron.com</u>) *Chapter 13 Trustee*

U.S. Trustee (ustpregion09.cl.ecf@usdoj.gov)

And by regular U.S. mail, postage paid, on:

Grant T. Wilcox 9858 Green Drive Windham, OH 44288

/s/ Peter G. Tsarnas
Peter G. Tsarnas, #0076934
Counsel for Debtor